FALCON ENVIRONMENTAL
A Division of Falcon Disposal Service, Inc

3031 E. "I" STREET, WILMINGTON, CALIFORNIA 90744
(213) 590-8531

TANK CLOSURE REPORT
PENNOYER DODGE
GLENDALE, CALIFORNIA

Prepared For

PENNOYER DODGE CORPORATION

Prepared By

ENVIRONMENTAL CONCEPTS

November 9, 1988

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INTRODUCTION

Pennoyer Dodge Corporation, located at 6634 San Fernando Road in Glendale, California operates a corporation involved in the distribution and servicing of automobiles. Pennoyer Dodge maintained two (2) 4,000 galllon underground storage tanks containing leaded gasoline and diesel fuel, and one (1) 550 gallon solvent tank (See Figure 1). Falcon Environmental was contracted by Pennoyer Dodge to permanently close the three tanks. Closure procedures involved the excavation and removal of the tanks, collection and laboratory analysis of soil samples and the backfilling and asphalting of the area.

TANK CLOSURE PROCEDURES

Closure of the tanks began on July 8, 1987. The concrete and soils surrounding the tanks were excavated and stockpiled adjacent to the excavation areas. The interior of the tanks were rinsed with water to assure that no residue remained. All liquid cleaning wastes were properly manifested and taken to Demenno/Kerdoon Treatment Facility in Compton, California for reclamation (See Appendix A). The tanks were rendered inert

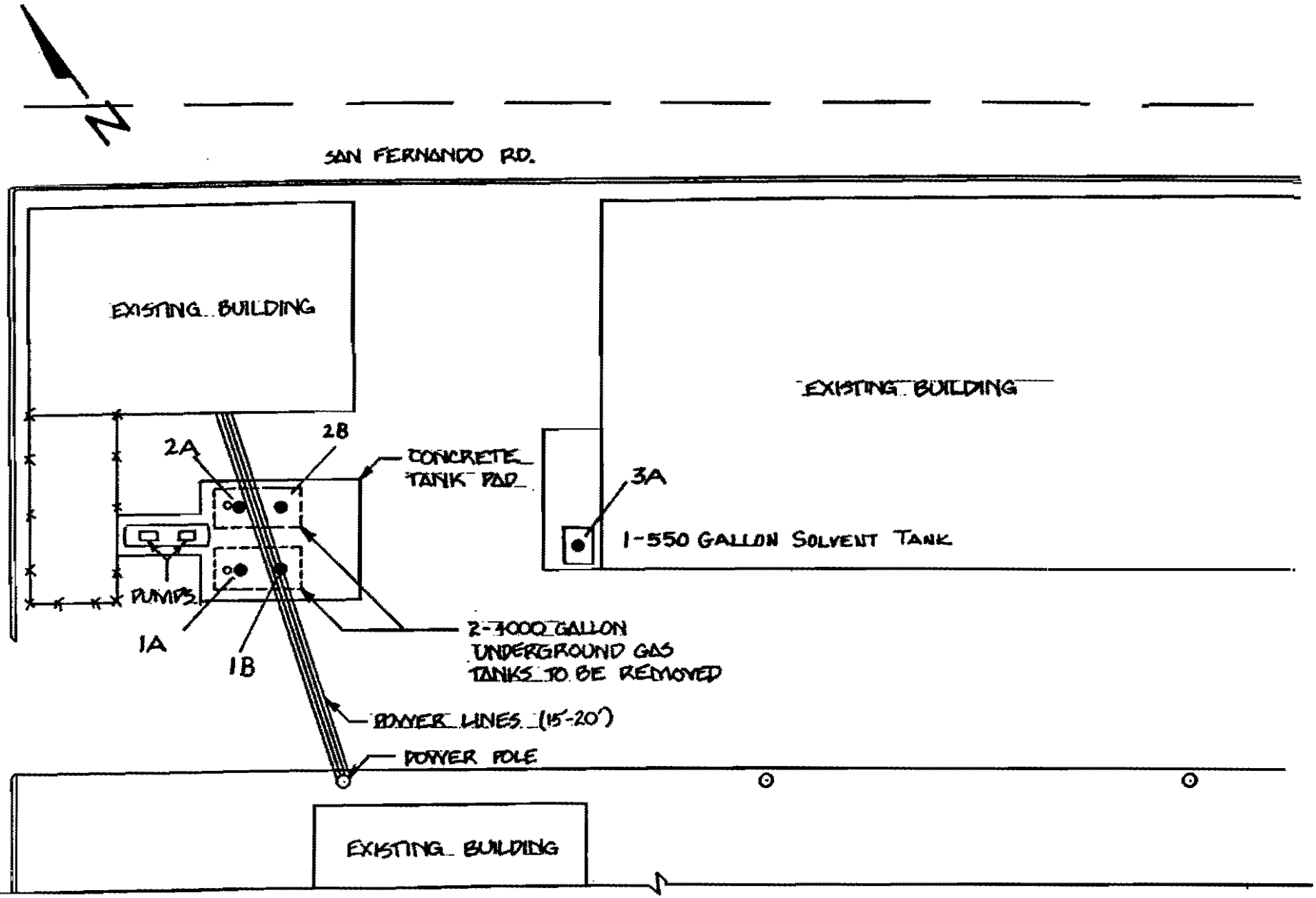

FIGURE 1

TOLERANCES	REVISIONS			TANK REMOVAL PLAN		
	NO.	DATE	BY			
DECIMAL ±	1			PENNOYER - DODGE		
	2			4694 SAN FERNANDO RD., GLENDALE		
FRACTIONAL ±	3			DRAWN BY B. ELLIS	SCALE 1"=20'	MATERIAL
ANGULAR ±	4			CHK'D	DATE 10/87	DRAWING NO.
	5			TRACED		

using dry ice and certified by a marine chemist, and then extracted and disposed of as scrap (See Appendix B).

Visible inspection by Falcon personnel immediately following the removal of the tanks indicated no visible loss of tank integrity. A total of five (5) soil samples were collected from the tank excavation areas. Four soil samples (1-A,1-B and 2-A, 2-B) were collected from the west and east ends of the two 4,000 gallon tank excavation at a depth of 12 feet below ground surface. The remaining soil sample was collected from the south end of the 550 gallon tank excavation at a depth of 10 feet below ground surface (See Figure 1).

No ground water was encountered during the tank removal operation. Depth to ground water at the project site is approximately 56.7 feet (Well Number 3903A, LACFCD, May, 1988).

The soil samples were packed in sterile 500 milliliter (ml), open mouth glass jars until completely full thereby allowing no headspace. The jars were then sealed with screw-top caps lined with Teflon, labeled, placed in Ziploc bags, and stored in a cooler with ice to maintain laboratory storage temperatures of approximately four degrees Centigrade. The samples were transported for analysis to GEOTEST based in Long Beach,

California, a State Certified laboratory. Chain-of-Custody records were completed for each sample to ensure traceability (See Appendix C).

LABORATORY RESULTS

Laboratory analysis of the soil samples were performed by GEOTEST of Long Beach, California to determine the historical integrity of the three underground tanks. The samples collected from beneath the unleaded gasoline and solvent tanks were analyzed in accordance with a modified EPA Method 8015, for nonhalogenated volatile organics. The two samples collected from beneath the diesel tank were analyzed in accordance with EPA Method 418.1 for Total Recoverable Hydrocarbons. The above mentioned sample methodology differs from that stated on the closure permit due to the two (2) 4,000 gallon tanks containing unleaded gasoline and diesel, rather than leaded gasoline. The results of these analyses and all Chain-of-Custody records can be found in Appendix C.

According to the Los Angeles County Department of Public Works the generally accepted action limit of petroleum hydrocarbons in soil is 100.0 parts per million (ppm). A hydrocarbon

concentration of 2.7 ppm, was detected in soil sample 2-A. However, all remaining samples exhibited undetectable hydrocarbon concentrations at a detection limit of less than 1.0 ppm.

CONCLUSIONS

Based on the soil sample analyses, it appears that the underground storage tanks at Pennoyer Dodge Corporation in Glendale, California have suffered no historic loss of integrity.

The preceding tank closure and soil sample acquisition was overseen by a California registered Civil Engineer, whose validation appears below:

Thomas E. Nuckols

State Registration Number: 20321

Thomas E. Nuckols

Signature

11/30/88

Date

APPENDIX A

State of California—Health and Welfare Agency

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. CAD008356958	Manifest Document No. 00091	2. Page 1 of 1	Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
PENNOYER—DODGE
6634 San Fernando Rd Glendale CA 91201

4. Generator's Phone (213) 245-8971

A. State Manifest Document Number 86137892

B. State Generator's ID

5. Transporter 1 Company Name: FALCON DISPOSAL
6. US EPA ID Number: CAD000478934

C. State Transporter's ID 702034
D. Transporter's Phone 213 390-8551

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
DEMENNO KERDON
2100 N ALAMEDA St
Compton CA 90222

10. US EPA ID Number: CAT080013352

G. State Facility's ID
H. Facility's Phone (213) 537-7100

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Liquid NOS ORM-E 9189	001	TT	01100	G	241
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
Wash Water 95%
Gas + Diesel 5%

K. Handling Codes for Wastes Listed Above
01

15. Special Handling Instructions and Additional Information
Gloves + Goggles

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name	Signature	Month	Day	Year
RAY E MILLIGAN JR	[signature]	7	7	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
JUAN MARTINEZ	Juan Martinez	07	07	[illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Leslie Smaltz	[signature]	07	15	87

GENERATOR

FACILITY

86137892

DHS 8022 A (1 1/85)
(EPA 8700—22)

GREEN: HAULER RETAINS

APPENDIX B

FALCON ENVIRONMENTAL
A Division of Falcon Disposal Service, Inc

3031 E. "I" STREET, WILMINGTON, CALIFORNIA 90744
(213) 590-8531

CERTIFICATE OF DESTRUCTION

Date received: July 9, 1987

From: Pennoyer-Dodge
6634 San Fernando Rd.
Glendale CA 91201

TANK ID#	SIZE
F-7-9-87-1	550 Gallon
F-7-9-87-2	4,000 Gallon
F-7-9-87-3	4,000 Gallon

Certified by Harbor Testing, Cert. # S 0605

This certifies that the above tank was received certified non-hazardous and safe for hot work (certificate attached) at the Falcon Environmental yard and were converted to scrap by flame cutting.

Don Kazarian
President

THOMAS D. BECK & ASSOC., INC.
dba HARBOR TESTING LABORATORY
24 HOUR PHONE (213) 834-5223

MARINE CHEMIST CERTIFICATE

SERIAL NO. S 0605

FALCON ENV. — PENNZOIL DOCK — 7-9-87
Company Requested by — Vessel Owner or Agent — Date

UNDERGROUND TANKS — STORAGE — 6634 SAN FERNANDO
Vessel — Type of Vessel — Specific Location of Vessel

GASOLINE, DIESEL, SOLVENT, LEL, O2, VIS. — TEST — 1615
Last Cargo — Test Method — Time Survey Completed

THREE UNDERGROUND TANKS MARKED BY RED PAINT
F-7-9-87-1
F-7-9-87-2
F-7-9-87-3

SAFE FOR HOT WORK TO SCRAP TANK FROM OUTSIDE
POST FIRE WATCH
NOT SAFE FOR WORKERS INSIDE TANK

F-76
87-199

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so effected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306-1980, Subsections 1-6.1 through 1-6.4, and Subsection 5-3.2).

SAFE FOR WORKERS: Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Safe for Workers has not been met.

SAFE FOR HOT WORK: Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

NOT SAFE FOR HOT WORK: Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306-1980 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 306-1980, and understands conditions and limitations under which it was issued."

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Pat Mucci (Name) Falcon (Company) — 7-9-87 (Date)

Signed [illegible] (Marine Chemist) — [illegible] (Certificate No.)

APPENDIX C

GEOTEST

An Environmental Monitoring and Testing Service

FIELD LABORATORY RESULTS REPORT

PREPARED FOR

FALCON ENVIRONMENTAL
PENNOYER DODGE

ANALYSIS OF HYDROCARBON CONTENT BY GAS CHROMATOGRAPHY
MODIFIED EPA METHOD 8015

DATE RECEIVED : JULY 9, 1987
DATE OF ANALYSIS : JULY 9, 1987
PROJECT NUMBER : 88501-61

SAMPLE ID #	CONCENTRATION (ppm)
88501-61-1A	ND,<1.0
88501-61-1B	ND,<1.0
88501-61-3A	ND,<1.0

Analyst:AA

Reviewed & Approved: Lisa Newcomb-Dell
Date: 7/10/87

*NOTE: Samples were received in a chilled state, intact and with Chain-of-Custody attached.

GEOTEST

An Environmental Monitoring and Testing Service

FIELD LABORATORY RESULTS REPORT

PREPARED FOR

FALCON ENVIRONMENTAL
PENNOYER DODGE

ANALYSIS OF HYDROCARBON CONTENT BY INFRARED SPECTROMETRY
EPA METHOD 418.1

DATE RECEIVED : JULY 9, 1987
DATE OF ANALYSIS : JULY 9, 1987
PROJECT NUMBER : 88501-61

SAMPLE ID #	CONCENTRATION (mg/kg)
88501-61-2A	2.7
88501-61-2B	ND,<1.0

Analyst:AA

Reviewed & Approved: Lisa Newcomb-Dietl
Date: 7/10/87

*NOTE: Samples were received in a chilled state, intact and with Chain-of-Custody attached.

GEOTEST
1860 Obispo Avenue, Suite A
Long Beach, California 90804
Telephone: (213) 498-9515

JUL 13 1987

CHAIN-OF-CUSTODY RECORD

PROJECT NO: 87501 31
DATE 7/9/87 PAGE 1 OF 1

PROJECT NAME Falcon Environmental
REFERENCE Penmar Dodge
ADDRESS 16634 San Fernando Rd.
Glendale, CA
SAMPLERS (SIGNATURE)
LABORATORY GEOTEST

SAMPLE NO.	DATE	TIME	LOCATION	METHODS: PETROLEUM HYDROCARBONS 8015	PETROLEUM HYDROCARBONS 418.1	BTXE (8020/602)	CAC METALS	HALOGENATED VOLATILE ORGANICS 8010	NUMBER OF CONTAINERS	COMMENTS/ CONTAINER TYPE
1A	7/9/87	1000a	Unloaded gas tank	✓					1	Soil, glass jar
1B		1015a	" " "	✓					1	
2A		1045a	Diesel tank		✓				1	
2B		11:00a	" "		✓				1	
3A	↓	1200n	Solvent tank	✓					1	↓

1 RELINQUISHED BY	DATE	3 RELINQUISHED BY	DATE	5 RELINQUISHED BY	DATE
SIGNATURE Luis Mejor	7-1-87	SIGNATURE		SIGNATURE	
PRINTED NAME Greg Micol	TIME 3:05 pm	PRINTED NAME	TIME	PRINTED NAME	TIME
COMPANY Falcon		COMPANY		COMPANY	

2 RECEIVED BY	DATE	4 RECEIVED BY	DATE	6 RECEIVED BY (LAB)	DATE
SIGNATURE		SIGNATURE		SIGNATURE Lisa Newcombe-Diel	7/9/87
PRINTED NAME	TIME	PRINTED NAME	TIME	PRINTED NAME Lisa Newcombe-Diel	TIME 3:05 pm
COMPANY		COMPANY		COMPANY GEOTEST	

5 TOTAL NUMBER OF CONTAINERS

SAMPLE CONDITIONS
RECEIVED ON ICE (YES) NO
SEALED YES (NO)

SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS: